

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TOWN OF IPSWICH,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 05-11114-MLW
NATIONAL UNION FIRE INSURANCE COMPANY)	
OF PITTSBURGH, PA)	
)	
Defendant.)	
)	
)	

JOINT MOTION TO EXTEND TIME TO REOPEN CASE

Plaintiff Town of Ipswich and Defendant National Union Fire Insurance Company of Pittsburgh, PA (collectively the “Parties”) hereby jointly move the Court to extend by 30 days the time by which the Parties may reopen the case. In support of this Motion, the parties state as follows:

1. On or about January 25, 2006, counsel for Plaintiff informed the Court that the Parties had reached agreement with respect to a settlement figure and were in the process of documenting the settlement.
2. On February 3, 2006, the Court entered a “Settlement Order of Dismissal”, ordering that the case be dismissed “without prejudice to the right of any party, upon good cause shown, to reopen the action within thirty (30) days if settlement is not consummated.”
3. The Parties have been working diligently, but have not yet completed their negotiations over the non-monetary terms of the Settlement Agreement, specifically the

language of the mutual releases that are contained within the Settlement Agreement. The Parties anticipate that they may not be able to complete their negotiations and have the Agreement signed within 30 days of the date of the Settlement Order of Dismissal.

4. Accordingly, the Parties jointly request that the time by which the Parties have to reopen the case be extended by 30 days, until April 3, 2006.

WHEREFORE the Parties jointly request that the Court enter an Order extending until April 3, 2006 the time by which the Parties may reopen the case.

Respectfully submitted,

TOWN OF IPSWICH

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA

By its attorneys,

By its attorney,

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Dated: February 22, 2006